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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF DEFENDANTS
UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC'S MOTION
TO PARTIALLY EXCLUDE OPINIONS OF
PLAINTIFFS' EXPERT VERONIQUE
VALLIERE**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

Judge: Mag. Lisa J. Cisneros
Courtroom: G – 15th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would
6 competently testify to the facts contained herein.

7 2. Attached as **Exhibit 1** is a true and correct copy of the September 26, 2025 Report of
8 Veronique Valliere.

9 3. Attached as **Exhibit 2** is a true and correct copy of the August 29, 2025 Order on Parties’
10 Motions in Limine and Motions to Exclude Expert Opinions in JCCP No. 5188.

11 4. Attached as **Exhibit 3** is a true and correct copy of the October 24, 2025 Deposition
12 Transcript of Veronique N. Valliere.

13 5. Attached as **Exhibit 4** is a true and correct copy of the Order in *In re Lyft Rideshare Cases*,
14 No. CJC-20-005061 (Sept. 30, 2025).

15 6. Attached as **Exhibit 5** is a true and correct copy of the July 18, 2025 Deposition Transcript
16 of Veronique N. Valliere.

17 I declare under penalty of perjury under the laws of the United States and the State of California
18 that the foregoing is true and correct.

19 Executed on November 10, 2025, in San Francisco, California.

20 /s/ Laura Vartain Horn

21 Laura Vartain Horn
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E-FILING ATTESTATION

I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Laura Vartain Horn
Laura Vartain Horn

EXHIBIT 1

FILED UNDER SEAL

EXHIBIT 2

FILED UNDER SEAL

EXHIBIT 3

FILED UNDER SEAL

EXHIBIT 4

FILED UNDER SEAL

EXHIBIT 5

FILED UNDER SEAL